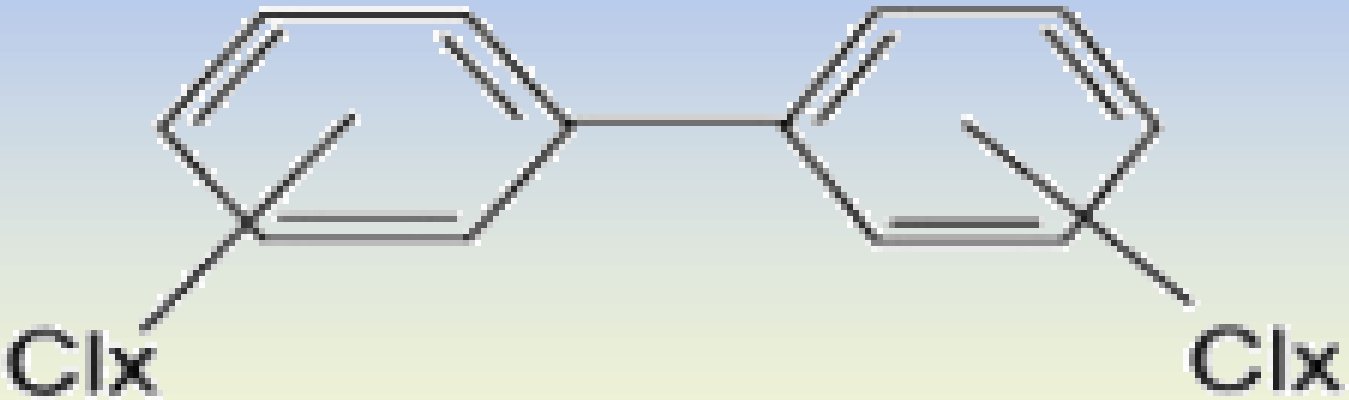
# PCB TMDL Monitoring Response to Comments Data Issues/Concerns

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VADEQ
June 11, 2007

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

# Submittals received April 27th

***March 29th TAC Meeting Minutes***

- ***Frank Harksen, Virginia Association of Municipal Wastewater Agencies, Inc (VAMWA)***
- ***Ron Dodson, Sanitary Board of Bluefield***

DEQ
VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

# VAMWA

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I. Purpose of TAC
   - Focus on sampling and analysis

II. Acceptable Methods & QA Criteria
   - Low level detection problematic
   - Consistency in data quality
   - Recommend validation study
   - Support use of method blank correction

III. Method 1668A may be Usable with:
   - Validation study
   - Proper QL

IV. Delaware River Basin has limited applicability to Virginia
   - Current VA effluent data below water quality standard
   - What were data acceptance criteria

V. VA PS not a significant source of PCBs
   - PCBs are a non-point source problem

VI. Conclusion
   - Current approach not acceptable

# VAMWA

I. Purpose of TAC

- Focus on sampling and analysis

**Response**:

- Agree
- Focus of June 11th meeting

# VAMWA

## II. Acceptable Methods & QA Criteria

- Low level detection problematic
- Consistency in data quality
- Recommend validation study
- Support use of method blank correction

**Response:**

- EPA recommended Method 1668A for generation of data used to determine TMDLs
- Standard Operating Procedure (SOP) to be developed for both sampling and laboratory
- Validation study conducted by EPA ( laboratories requesting discrete chemical analyzes)
- Method blank correction acceptable for Potomac River

# VAMWA

## III. Method 1668A may be Usable:

- Validation study
- Proper QL

## **Response**:

- EPA recommends Method 1668A for generation of data used to determine TMDLs

- Validation study conducted by EPA (laboratories requesting DCA)

- Quantification level (QL) is defined as the lowest conc used for the calibration of a measurement system. In this case it is for *each congener.* For example, calibration was from 8-11 pg/L for the Potomac River

# VAMWA

IV. Delaware River Basin has limited applicability to Virginia

- VA effluent data below water quality standard
- Data acceptance criteria?

**Response**:

- TMDL development requires all sources of a given pollutant (e.g., PCBs) be identified
- DRBC applied EPA's data quality objectives (DQO) process as part of their decision-making study

# VAMWA

V. VA PS not a significant source

- PCBs are a non-point source problem

**Response**:

- TMDL development requires all sources of a given pollutant (e.g., PCBs) be identified and loads calculated.

# **Dodson**
# Sampling/reporting Issues

a) Will the samples be collected over a period of one year on a quarterly and bi-monthly basis or will permittees be aloud to collect samples on an irregular basis during the year?

b) Will the collection of wet samples be aloud to be lump together during the rainy season or will they have to be spread out over the year and will the increase in plant flows caused by melting snow be acceptable as wet sample conditions?

c) Will all participants use the same lab?

d) How will non-detect congeners be reported?

e) Will there be a glossary?

# Dodson
# 1. Sampling

**Response**:

a, b, & d - The field methods standard operating procedures (SOP) should address these.

c - DEQ can not endorse any laboratory, but will provide a list of “acceptable” labs that have agreed to a set of established laboratory performance requirements

e – a glossary can be added to the SOP

# Dodson
# 2. SIC Codes

Will there be a table within the data base of SIC Codes and congeners associated with the codes?

**Response**:

At this point, we are not aware of data to comprise such a data base and we do not anticipate creating such a database at this time.

# 3. Homolog Groups:

**Has there been human tissue test performed for PCB's? If so what Homolog Groups were the highest and what SIC Codes are associated with the congeners with the highest results in both human and fish?**

**Response:**

- Yes, human tissue and milk have been tested for PCBs
- Highly chlorinated PCB congeners concentrate into media with high organic content. For example in one study, human milk had a higher proportion of tri-, tetra- and penta-PCBs, while low chlorinated PCBs were not found.
- Unable to find a specific reference to homolog groups from human tissue to SIC codes

# 4. Super Fund Sites

**Will known previously cleaned PCB Super Fund sites be retested using Method 1668A?**

**Response:**

- If a site is shown to be a significant contributor, then additional sampling would be recommended
- Remediated sites along the Potomac were not significant sources of PCBs, so additional monitoring was not recommended

# Analytical Requirements QA/QC

- Qualified Laboratories – ability to perform method
- Adhere to 1668A QC requirements
  - Method Blanks
  - Spike Recoveries ($^{13}C$ labeled Congeners)
  - IPR/OPR (Initial/On-going Performance & Recovery)
- Rinsate Blanks (none issue composite grabs)